

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**GOVERNMENT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL
INFORMATION IN OPPOSITION
TO DEFENDANT'S EMERGENCY MOTION TO STAY SENTENCE**

The government respectfully moves for leave to file supplemental information in opposition to Defendant’s Emergency Motion to Stay Sentence (“Emergency Motion”) (Docket No. 155). Defendant opposes this Motion.

As grounds, the government states that Defendant raised issues for the first time at the hearing, including the submission of its exhibits (the sample licenses), thus foreclosing the opportunity for the government to research and adequately respond. Since the hearing, the government was able to obtain additional information, which would have been relevant to the Court's consideration of a sentence, but is at the very least, relevant to the Court's consideration of the pending Emergency Motion. The government has prepared a brief additional submission and has compiled the information gathered since the revocation hearing in the attached Affidavit of Special Agent Christina Rosen for the Court's consideration.

Wherefore, the government respectfully requests that the Court accept this information as a supplement to its opposition to Defendant's Emergency Motion.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Eugenia M. Carris
Eugenia M. Carris
Assistant U.S. Attorney

Dated: September 25, 2014

Certificate of Service

I hereby certify that, on the above date, this document was filed through the ECF system which sends copies electronically to the registered participants.

By: /s/ Eugenia M. Carris
Eugenia M. Carris
Assistant U.S. Attorney